1	STEPHANIE M. HINDS (CABN 154284) United States Attorney			
2	MICHELLE LO (NYRN 4325163) Chief, Civil Division			
3	ADRIENNE ZACK (CABN 291629) Assistant United States Attorney			
4	450 Golden Gate Avenue, Box 36055			
5	San Francisco, California 94102-3495 Telephone: (415) 436-7031			
6	FAX: (415) 436-6748 adrienne.zack@usdoj.gov			
7	Attorneys for Defendant			
8	UNITED STAT	TES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA			
10	OAKL	AND DIVISION		
11	EEDVANDO A ODEZ	\		
12	FERNANDO LOPEZ,) CASE NO. 4:22-CV-01742-DMR		
13	Plaintiff,) STIPULATION TO EXTEND TIME WITHIN WHICH TO ANSWER OF RESPONDAND TO		
14 15	v. UNITED STATES OF AMERICA,	 WHICH TO ANSWER OR RESPOND AND TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND ORDER (AS MODIFIED) 		
16	Defendant.)		
17	Defendant.	_{}		
18	Pursuant to Civil Local Rule 6-1(a), the parties to this action stipulate to extend Defendant's t			
19	within which to answer or otherwise respond to	the complaint until August 4, 2022.		
20	Additionally, pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action hereby			
21	stipulate and request that the Court continue the	Case Management Conference currently set for June 29		
22	2022, see ECF No. 5, and all associated deadlines until August 31, 2022, at 1:30 p.m. The parties request this change because the pleadings in this matter are not yet settled, and the parties respectfully suggest that a case management conference will be more productive after Defendar has responded to the complaint. This is the parties' first joint request to modify the schedule in this case. See Declaration of Adrienne Zack ¶ 3. The requested modification will not impact the schedule for the case because no			
23				
24				
25				
26				
27				
28	turther schedule has yet been set and because th	is matter is still in its initial stages. Zack Decl. ¶ 4.		
	STIP TO EXTEND RESPONSE DEADLINE & CMC			

CASE NO. 4:22-CV-01742-DMR

1 2 DATED: June 13, 2022 Respectfully submitted, 3 STEPHANIE M. HINDS /s/ Marie C. Ballon. 1 MARIE C. BALLON (CABN 227191) United States Attorney 4 Southwest Legal Group 22440 Clarendon Street, Suite 200 /s/ Adrienne Zack 5 Woodland Hills, CA 91367 ADRIENNE ZACK mballon@swlegalgrp.com Assistant United States Attorney 6 (818) 591-4300 Attorneys for Defendant 7 Attorney for Plaintiff 8 9 **ORDER (AS MODIFIED)** 10 11 Pursuant to stipulation, IT IS SO ORDERED that the Initial Case Management Conference is 12 continued until August 31, 2022 at 1:30 p.m. in Oakland, by video conference only. Parties shall file a joint case management conference statement by August 24, 2022. All parties and counsel, may access 13 the webinar information at https://www.cand.uscourts.gov/dmr. 14 15 IT IS SO ORDERED AS MODIFIED. 16 IT IS SO ORDERED 17 udge Donna M. Ryu 18 DATED: 19 strate Judge 20 21 22 23 24 25 26 27 ¹ In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document. 28

STIP. TO EXTEND RESPONSE DEADLINE & CMC CASE NO. 4:22-CV-01742-DMR

OAKLAND DIVISION FERNANDO LOPEZ, Plaintiff, V. UNITED STATES OF AMERICA, Defendant. I, ADRIENNE ZACK, declare as follows: 1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation. 2. On June 7, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled. 3. This is the parties' first joint request to modify the schedule for this matter.				
OAKLAND DIVISION FERNANDO LOPEZ, Plaintiff, V. DECLARATION OF ADRIENNE ZACK IN SUPPORT OF JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE I, ADRIENNE ZACK, declare as follows: 1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation. 2. On June 7, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled. 3. This is the parties' first joint request to modify the schedule for this matter.	2 3 4 5 6 7 8	United States Attorney MICHELLE LO (NYRN 4325163) Chief, Civil Division ADRIENNE ZACK (CABN 291629) Assistant United States Attorney 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 Telephone: (415) 436-7031 Fax: (415) 436-6748 adrienne.zack@usdoj.gov Attorneys for Defendant	ES DISTRICT COURT	
OAKLAND DIVISION FERNANDO LOPEZ, Plaintiff, V. DECLARATION OF ADRIENNE ZACK IN SUPPORT OF JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE I, ADRIENNE ZACK, declare as follows: 1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation. 2. On June 7, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled. 3. This is the parties' first joint request to modify the schedule for this matter.	10	NORTHERN DIS	TRICT OF CALIFORNIA	
Plaintiff, v. UNITED STATES OF AMERICA, Defendant. I, ADRIENNE ZACK, declare as follows: 1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation. 2. On June 7, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled. 3. This is the parties' first joint request to modify the schedule for this matter.	11			
I, ADRIENNE ZACK, declare as follows: 1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation. 2. On June 7, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled. 3. This is the parties' first joint request to modify the schedule for this matter.	13 14 15	Plaintiff, v. UNITED STATES OF AMERICA,	DECLARATION OF ADRIENNE ZACK IN SUPPORT OF JOINT STIPULATION TO CONTINUE CASE MANAGEMENT	
2. On June 7, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled. 3. This is the parties' first joint request to modify the schedule for this matter.	17 18 19 20 21 22 23	1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this		
LITOR DECLIMATION 100 DITE TO CONT. CINC	23 24 25 26 27 28	efendant's deadline to respond to the complaint and the upcoming case management conference. Vereed to extend the response deadline for 30 days, until August 4, 2022, and to request a continuance case management conference because the pleadings in the case are not yet settled.		

1

4:22-CV-01742-DMR

1	4. The requested continuance of the case management conference will not affect the		
2	schedule for the case because no further schedule has yet been set and because this matter is still in its		
3	initial stages.		
4			
5	I declare under penalty of perjury under the laws of the United States that the above is true and		
6	accurate to the best of my information, knowledge, and belief. Executed this 13th day of June, 2022, in		
7	San Francisco, California.		
8	/s/ Adrienne Zack		
9	ADRIENNE ZACK Assistant United States Attorney		
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			